

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-20021-CR-GAYLES

UNITED STATES OF AMERICA,

v.

EMANUEL ASHTOR,

Defendant.

_____ /

MOTION FOR PERMISSION TO CHANGE RESIDENCE

Defendant, **EMANUEL ASHTOR**, by and through undersigned counsel, hereby files this Motion for Permission to Change Residence and in support states:

1. On January 21, 2025, the United States filed a Sealed Indictment. Defendant was subsequently arrested on January 22, 2025.
2. On January 22, 2025, an Order granting the United States' Motion to Unseal the Indictment was granted. [DE 6]. The Indictment charges the Defendants with Conspiracy to Damage a Protected Computer in violation of 18 U.S.C. § 371 (Count 1); Conspiracy to Commit Wire Fraud and Mail Fraud in violation of 18 U.S.C. § 1349 (Count 2); Conspiracy to Commit Money Laundering in violation of 18 U.S.C. § 1956(h) (Count 3); and Conspiracy to Transfer False Identification Documents in violation of 18 U.S.C. §1028(a)(2) and (f). [DE 3].
3. On February 6, 2025, Defendant was arraigned in this matter and was released from custody subject to the standard pre-trial release conditions. [DE 15].
4. Since his arrest and release from custody, Defendant has complied with the pre-trial release conditions.

5. Following his arrest, Defendant was forced to vacate his residence at Hazel South Park, 4401 Barclay Downs Dr, Unit 225, Charlotte, NC 28209, by February 18, 2025, with little notice.
6. Defendant promptly secured a new residence and has entered into a one-year lease (February 20, 2025 - February 19, 2026) at 2117 Zephyr Wind Way, Charlotte, NC 28212.
7. Defendant has provided notice of the change of address to Pre-trial Services, Officer Rodrick Burnette, who visited the new residence on February 28, 2025.

CERTIFICATE OF CONFERRAL PURSUANT TO LOCAL RULE 88.9

On February 28, 2025, the undersigned conferred with AUSA Sean Paul Cronin and Gregory Jon Nicosia regarding the substance of this motion who advised that the Government does not object to the Court granting this Motion.

WHEREFORE, the Defendants pray that this Honorable Court will grant the relief requested herein and for any other relief the Court deems fair and just.

Respectfully submitted,

QUINTERO BROCHE, P.A.

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BY: /s/ Frank Quintero, Jr.

FRANK QUINTERO, JR.

Florida Bar No.: 399167

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 28, 2025, a true and correct copy of the foregoing has been filed and served on all counsel of record via CMECF.

Respectfully submitted,

BY: /s/ Frank Quintero, Jr.
FRANK QUINTERO, JR.
Fla. Bar 399167